

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

FARHAT ALI §
§
Plaintiff, §
§
v. § CIVIL ACTION NO. 4:22-CV-00036
§
LIBERTY MUTUAL INSURANCE §
COMPANY, §
§
Defendant. §

DEFENDANT LIBERTY MUTUAL INSURANCE COMPANY'S
OFFER OF JUDGMENT PURSUANT TO RULE 68 OF
THE FEDERAL RULES OF CIVIL PROCEDURE

TO: Plaintiff Farhat Ali, through his attorney of record,
Chad T. Wilson
Donald C Green, II
Chad T. Wilson Law Firm PLLC
455 East Medical Center Blvd., Suite 555
Webster, Texas 77598

NOW INTO COURT, through undersigned counsel, comes Defendant Liberty Mutual Insurance Company, who, pursuant to Rule 68 of the Federal Rules of Civil Procedure, hereby makes an *Offer of Judgment* to Plaintiff Farhat Ali in the amount of **Thirty Thousand dollars and zero cents (\$30,000.00)**, said sum being inclusive of any and all claims and causes of action, including but not limited to contractual and extra-contractual claims, interest, penalties, fees, and costs, and without admission of liability or fault on the part of Defendant Liberty Mutual Insurance Company. This *Offer of Judgment* is conditioned on the mortgage company "AGORA Lending A division of One American," who is a loss payee on the Policy, being included on the check in accordance with Plaintiff Farhat Ali's homeowner's policy.

If this *Offer of Judgment* is not accepted within fourteen (14) days of service, it shall be deemed withdrawn, and evidence of the *Offer of Judgment* will be inadmissible, except in a proceeding to determine costs. Fed. R. Civ. P. 68.

Acceptance of this *Offer of Judgment* will be deemed final judgment of any and all claims pending between Plaintiff Farhat Ali and Defendant Liberty Mutual Insurance Company.

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, L.L.P.

By: /s/ J. Mark Kressenberg
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**ATTORNEYS FOR DEFENDANT,
LIBERTY MUTUAL INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 12, 2022, a true and correct copy of the foregoing instrument was served upon all known counsel of record in accordance with the Federal Rules of Civil Procedure, and any applicable Local Rules, as follows:

Chad T. Wilson
Donald C Green, II
Chad T. Wilson Law Firm PLLC
455 East Medical Center Blvd., Suite 555
Webster, Texas 77598

/s/ J. Mark Kressenberg
J. Mark Kressenberg